

1 SILVANO B. MARCHESI (SBN 42965)
County Counsel
2 GREGORY C. HARVEY(SBN 47974)
Assistant County Counsel
3 COUNTY OF CONTRA COSTA
651 Pine Street, 9th Floor
4 Martinez, California 94553
Telephone: (925) 335-1800
5 Facsimile: (925) 335-1866
email: gharv@cc.cccounty.us

6 Attorneys for Defendants
7 COUNTY OF CONTRA COSTA
and CITY OF SAN RAMON
8

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11

12 ABHINAV BHATNAGAR,
13 Plaintiff
14

15 v.

16 JASON INGRASSIA, COUNTY OF
CONTRA COSTA, and CITY OF SAN
17 RAMON,
18 Defendants.
19

Case No. CV07-02669 CRB

DECLARATION OF BARBARA
HOULIHAN

20 I, Barbara Houlihan, declare:
21

- 22 1. I make the following declaration based on my personal knowledge and, if called as a
23 witness, I am competent to testify to the matters stated below.
24
- 25 2. I am a dispatcher for the Contra Costa County Sheriff's Department and contract cities
26 where the Sheriff provides police services. In May of 2006, the Sheriff provided police
27 services to the City of San Ramon.
28

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- 1 3. I have worked as a dispatcher for the County for ten years.
- 2
- 3 4. As part of my duties, I receive emergency and non-emergency calls made requesting
- 4 police assistance, I dispatch officers by radio to locations in the community to respond
- 5 to calls, receive calls from officers as to their location, availability for service and their
- 6 activities, and provide a communications link for back-up and technical support.
- 7
- 8 5. In addition to the partial list of activities in paragraph 4, I make entries in a
- 9 computerized log of the calls received and made at the time of the calls. This document
- 10 is called a dispatch log.
- 11
- 12 6. Exhibit B is a compilation of true and correct copies of the dispatch log entries for the
- 13 night of May 19-20, 2006 relating to Officers Ingrassia, Jones and Mr. Bhatnagar.
- 14 a. B-1 covers transmission relating to Officers Jason Ingrassia (CC92-94)
- 15 b. B-2 covers transmissions relating to Officer Nathan Jones (CC95-96)
- 16 c. B-3 covers transmissions specifically associated with Officer Ingrassia's
- 17 interaction with Abhinav Bhatnagar (CC89-90).
- 18 d. B-4 is a map of San Ramon upon which I have located the locations referred to
- 19 in the transmissions (1) Montevideo and Davonna, (2) 2114 Crestfield, (3)
- 20 Central Park at Bollinger Canyon Road and Alcosta Boulevard.
- 21
- 22 7. I was on duty the night of May 19-20, 2006 and participated in the calls listed below ,
- 23 with the sole exception of the 2:44 a.m call shown in subparagraph k . I am familiar
- 24 with the codes that are used in the dispatch log. The dispatch log indicates the
- 25 following transmissions between midnight of May 19 and 2:44:13 am on May 20, 2008.
- 26 a. 12:04:00 a.m At 12:04 a.m., Officer Ingrassia reported that he was
- 27 (Ingrassia) making a traffic stop at *Montevideo and Davonna* in San
- 28 Ramon. At 12:05 a.m., Officer Ingrassia requested

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1 information from me on David Mock and provided Mr.
2 Mock's drivers license number. At 12:44:48, Officer
3 Ingrassia reported that he had cleared the scene from his
4 traffic stop at Montevideo and Davonna.

5
6 b. 12:08:25 At 12:08:25, Officer Jones reported that he was
7 (Jones) involved in a traffic stop at Wedgewood and Bollinger.
8 He reported that he cleared the scene at 12:09:23. He
9 then responded to an alarm at Hellicon Court.at 12:13
10 a.m and cleared that scene at 12:21:35

11
12 c. 12:34:24 At 12:34:24, Officer Nathan Jones was dispatched to
13 (Jones) back up another officer at Longs in San Ramon at 2455
14 San Ramon Valley Road. He reported that he was on
15 scene at 12:39:09. He reported that he was clear of the
16 scene at 12:41:44.

17
18 d. 12:43:26 At 12:43:26, I dispatched Officer Jones to 2316 Canyon
19 (Jones) Village, but at 12:44:32 I preempted this call.

20
21 e. 12:44:32 At 12:44:32, I dispatched Officer Jones to 2114
22 (Jones) Crestfield Drive to provide backup. At 12:45:41, Officer
23 Jones acknowledged that he was on his way to provide
24 back up at 2114 Crestfield Dr. At 12:50:14, the on-
25 scene button was pressed on the unit computer
26 automatically transmitting a message indicating that
27 Officer Jones was on scene. At 12:58:43, Officer Jones
28 reported that he was back in service.

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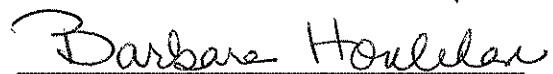
- 1
2 f. 12:45:09 Officer Ingrassia indicated that he was on his way to
3 (Ingrassia) provide backup at *2114 Crestfield Drive*. At 12:50:28,
4 Officer Ingrassia reported that he was on scene at 2114
5 Crestfield Drive. At 12:58:42, Officer Ingrassia reports
6 that he was back in service.
7
8 g. 01:03:43 Officer Ingrassia reported to me that he was checking
9 (Ingrassia) out the area of *Central Park*, a large park at the location
10 of *Alcosta Boulevard and Bollinger Canyon Road in*
11 *San Ramon*. At 01:07:18 he reports that he has just
12 cleared that location.
13
14 h. 01:07:50 I transmitted a call for response to a report of
15 (Ingrassia) "suspicious circumstances." Officer Ingrassia
16 "preempted" this call at 01:08:23. This means that he
17 was asking that some other officer be assigned to
18 respond.
19
20 i. 01:08:23 At 01:08:23, Officer Ingrassia also reported that he was
21 (Ingrassia) making a traffic stop at the Valero Gas Station on
22 Market Place of a vehicle with the license 5FXA510.
23 At 01:08:42, Officer Ingrassia indicated that he was
24 going to perform a field sobriety test.
25
26 j. 01:09:18 I dispatched Officer Jones to the Valero Station to
27 provide backup. At 01:09:58, Officer Jones reported
28 that he was on scene. At 01:14:55., the log reflects that

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1 Officer Jones requested information through his unit's
2 computer terminal relating to Abhinav Bhatnagar by
3 entering in to the computer terminal Mr. Bhatnagar's
4 driver's license and birthdate.

5
6 k. 01:30:53 At 01:30:53, Officer Ingrassia reported that he had one
7 person in custody for DUI. At 01:31:00, I transmitted a
8 case number to Officer Ingrassia. At 01:31:02, Officer
9 Ingrassia requested a tow vehicle. At 01:32:05, I input
10 into the computer the identity of the tow company that
11 was actually enroute to his location. At 01:37:13, Officer
12 Ingrassia reported that he was on scene at the San
13 Ramon Police Station. At 01:39:46, Officer Ingrassia
14 requested that a blood alcohol technician be sent to San
15 Ramon PD for a blood alcohol draw. There are no
16 further transmissions from Officer Ingrassia in the log
17 until 02:44:13, when Officer Ingrassia reported that he
18 was on his way to Martinez Detention facility with one
19 in custody.

20
21 The above statements are true and correct. Executed under penalty of perjury on March
22 31, 2008.

23
24 

25 Barbara Houlihan
26
27
28

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